

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: JOANN INC., ¹ Post-Effective Date Debtor.)))))))	Chapter 11 Case No. 25-10068 (CTG) Re: Docket No. ____
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**CONSENT ORDER APPROVING JOINT STIPULATION
REGARDING THE ADMINISTRATIVE CLAIMS OF ORACLE AMERICA, INC.**

Pursuant to and in accordance with the *Joint Stipulation Regarding Administrative Claims of Oracle America, Inc.* (the “Stipulation”)² attached hereto as **Exhibit 1**, and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the Court under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief set forth herein is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and with the consent of the Parties; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Stipulation.

1. The Stipulation is hereby approved and the terms of the Stipulation are hereby made effective by this Consent Order.

2. Sufficient notice of this Consent Order has been provided and the requirements of Rule 3007 of the Federal Rules of Bankruptcy Procedure and any applicable local rules of this Court are otherwise satisfied.

3. Notwithstanding any applicable rules to the contrary, this Consent Order shall be immediately binding and enforceable upon its entry.

4. The Debtors and the Plan Administrator are authorized to take all actions necessary to effectuate the relief granted in this Consent Order.

5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Consent Order.

Exhibit 1

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC.,¹

Post-Effective Date Debtor.

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Chapter 11

Case No. 25-10068 (CTG)

**JOINT STIPULATION REGARDING
ADMINISTRATIVE CLAIMS OF ORACLE AMERICA, INC.**

Ann Aber, the Plan Administrator, for and on behalf of the Debtors (collectively, “Debtors”), Oracle America, Inc. (“Oracle” and together with the Debtors, collectively, the “Parties”), by and through their undersigned counsel, hereby enter into this stipulation (this “Stipulation”) as to the following:

1. Oracle is a licensor of computer software and pursuant to agreements, provides software-related products, technical support, maintenance, educational materials, and programs, as well as cloud-based and point of sale services, which Oracle often customizes for the customer’s specific needs.

2. Prior to January 15, 2025 (the “Petition Date”), Jo-Ann Stores, LLC and Oracle were parties to several such license agreements (the “Oracle Agreements”). The Oracle Agreements were rejected effective May 31, 2025.

3. On April 4, 2025, pursuant to the *Notice of Deadlines for the Filing of Proofs of Claim, Including Pursuant to Section 503(b)(9) of the Bankruptcy Code*, Oracle timely filed a claim in the total amount of \$339,733.53 designated as Claim No. 10877, which included an

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administrative claim in the amount of \$245,877.95 (the “Initial Administrative Request”) and a general unsecured claim of \$93,855.58.²

4. In addition, on or about August 8, 2025, Oracle filed its *Oracle America, Inc.’s Request for Allowance and Payment of Chapter 11 Administrative Expenses* [Docket No. 1545] (the “Administrative Expense Motion”). Between the Initial Administrative Request and the unpaid portion of the Administrative Expense Motion, Oracle was asserting a total administrative priority amount of \$454,417.47.

5. The Plan Administrator asserts that Debtors have paid a portion of the administrative expenses due and owing to Oracle and that the remaining administrative expense claim is \$356,170.01, leaving a variance of \$98,247.46.

6. Plan Administrator and Oracle hereby agree to resolve the administrative claims set forth in Claim No. 10877 and the Administrative Expense Motion by payment of \$356,170.01 to Oracle, with the remaining variance of \$98,247.46 being added to the general unsecured portion of Oracle’s Claim No. 10877, for a total revised general unsecured claim of \$192,103.04 (\$93,855.58 + \$98,247.46).

7. Within five (5) business days of the entry of the Consent Order, Oracle agrees to withdraw the Administrative Expense Motion with prejudice. The Parties stipulate and agree that the Plan Administrator may prepare and submit any order that is consistent with this Stipulation.

8. For the avoidance of doubt, the general unsecured portion of Claim No. 10877 shall remain on the Claims Register with a general unsecured claim of \$192,103.04, subject to the GUC Trust’s further objection on any substantive or non-substantive grounds.

² On or about August 14, 2025, Oracle filed a general unsecured proof of claim designated as Claim No. 19846 in the amount \$1,038,005.92. This Stipulation does not address Claim No. 19846.

STIPULATED and AGREED this 9th day of January, 2026:

Dated: January 9, 2026
Wilmington, Delaware

/s/ James E. Huggett

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